



Cert.NO. 10BK 00203

DEPT OF TRANSPORTATION
DOT

SP-14879N

June 15, 2009

U.S Department
of Transportation

Pipeline and Hazardous
Materials Safety Administration

PHMSA-2009-0229

Attention : Mr. Delmer F. Billings / Director,
Office of Hazardous Materials Special Permit & Approval

Subject : Application for Special Permit

Dear Mr. Billings

AA) General

1. Information of applicant

1) Facility Address

NK. CO., LTD.

1464-1, Songjeong-Dong, Gangseo-Gu, Busan City, 618-270, South Korea.

2) Contact Point : Mr. S O Kang / Assistant Manager

Phone : 82-51-832-0131~4

Fax : 82-51-832-0135

3) E-mail address : sokang@nkc.com

2. Agent in U.S.A

Busan Trade Office

4801, Wilshire Blvd., Suite 210

Los Angeles, CA 90010

Phone : (323) 935-8200

Fax : (323) 935-8202

3. Facility Address

NK. CO., LTD.

1464-1, Songjeong-Dong, Gangseo-Gu, Busan City, 618-270, South Korea.

BB) Confidential treatment

CC) Description of special permit proposal

1. A citation of the specific regulation from which the applicant seeks relief

: CFR 49 180. 209 Requirements for requalification cylinders

2. Specification of the proposed mode or modes of transportation

: Tube trailer, ISO Frame with 8, 9, 11 or 12 cylinders



#497 Shinpyeong-Dong, Saha-Gu, Busan, Korea
Tel. 051-204-2211~3 / 207-2211~5
Fax. 051-204-2215 / 207-2216 / 291-2788
www.nkcf.com



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3. A detailed description of the proposed special permit
: To extend retest period of cylinder manufactured in accordance with DOT 3AAX to 10 years.
Because cylinders mounted on tube trailer or ISO frame is filled less than cylinders moved individually. So, those are damaged less.
4. A specification of the proposed duration or schedule of events for which the special permit is sought
: NK produces the cylinder to be mounted on Tube Trailer or ISO frame every months.
NK want to get the SP ASAP to satisfy our customers.
5. A statement outlining the applicant's basis for seeking relief from compliance with the specified regulations and, if the special permit is requested for a fixed period, a description of how compliance will be achieved at the end of that period
 - 1) 209 (b), (f), (h), (j)
The cylinder, 3AAX manufactured by us for gases identified in 209(b)(ii) and Nitrogen Trifluoride
 - 2) 209(b)(2) in accordance with CFR173.302a(b)(2) (3) and instead of (4)
we will test cylinders by UT when manufactured and retest to detect corrosion, pitting or dangerous defects
At the end of that period, We will provide list of the cylinders manufactured in accordance with SP and of accidents to renewal.
6. -
7. Identification and description of the hazardous materials planned for transportation under the special permit
180.209 (b)(1)(ii) and Nitrogen trifluoride
8. Description of each packaging, including specification or special permit number, as applicable, to be used in conjunction with the requested special permit;
: The cylinder made in accordance with DOT 3AAX is assembled on ISO frame or Tube Trailer.
SP8915 is applied.
9. -
10. When a Class 1 material is forbidden for transportation by air craft
: Our cylinder mounted on ISO frame or Tube trailer is transported by ship or trailer only

DD) Justification of special permit proposal

1. Information describing all relevant shipping and incident experience of which the applicant is aware that relates to the application
: The shipping is Tube trailer or ISO frame
No incident
2. A statement identifying any increased risk to safety or property that may result if the special permit is granted, and a description of the measures to be taken to address that risk
: If retest period of cylinders mounted on ISO frame or Tube Trailer is extended, risk of corrosion and pitting will increase.
So, we will test the cylinder by UT not hydro and visual.
UT test is more suitable than hydro test to detect imperfections.
Also, the number of cycling refill of cylinder mounted on ISO frame and Tube Trailer is less than the cylinder used each.



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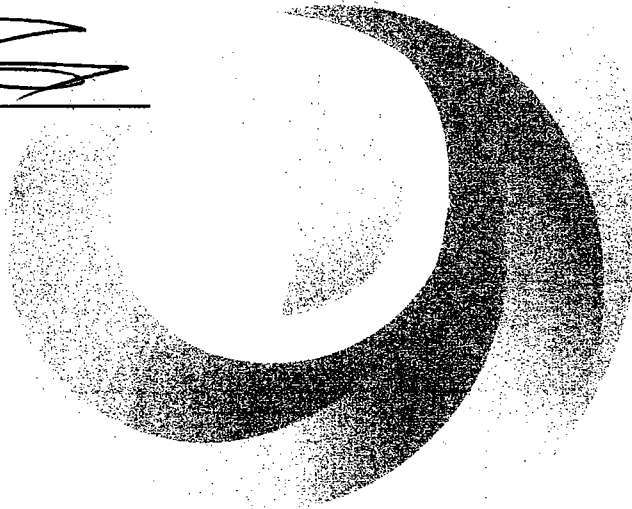
3.

: limitation of the number of filling help to protect cylinders from increasing risks.
The number of filling is limited to 600 for 10 years.

Your earliest approval would be much appreciated.

Best Regards

S. O. KANG
QM Div. Manager
NK CO., LTD.



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Lavalle, Diane (PHMSA)

From: Special Permits (PHMSA)
Sent: Monday, June 15, 2009 6:54 AM
To: Lavalle, Diane (PHMSA)
Subject: FW: Application for Special Permit(retest period :10 years)
Attachments: application.pdf

From: sokang@nkcf.com [mailto:sokang@nkcf.com]
Sent: Monday, June 15, 2009 12:13 AM
To: Special Permits (PHMSA)
Cc: igbang@nkcf.com
Subject: Application for Special Permit(retest period :10 years)

Dear Sir,

We make an application for special permit in accordance with
CFR 49 107.105.

Thank you for your cooperation.

Best Regards,
Mr. Kang

S.O. KANG Team Manager
Quality Assurance Team
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6/15/2009